

McDermott Will & Emery

Boston Brussels Chicago Düsseldorf Houston London Los Angeles Miami Milan
Munich New York Orange County Rome San Diego Silicon Valley Washington, D.C.
Strategic alliance with MWE China Law Offices (Shanghai)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:

DATE FILED: 4/15/11

John J. Dabney
Attorney at Law
jdabney@mwe.com
+1 202 756 8343

April 15, 2011

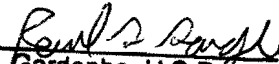
VIA FACSIMILE -(212) 805-7986

Hon. Paul G. Gardephe
United States District Judge
United States Courthouse
500 Pearl Street
Room 920
New York, NY 10007-1312

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: April 15, 2011

Re: *Guggenheim Capital, et al. v. Toumei, et al.*
C.A. No. 10 Civ 8830 (PGG)

Dear Judge Gardephe:

I am writing on behalf of Plaintiffs Guggenheim Capital, LLC, et al., to request a brief continuance of today's deadline for Plaintiffs to file their remaining papers in support of Plaintiffs' Motion for Default Judgment against Defendant David Birnbaum and Defendant Dabir International, Ltd.

Due to scheduling reasons, and for other good cause, Plaintiffs request a one-day extension of today's deadline, thus allowing Plaintiffs until 5:00 p.m. on Monday, April 18, 2011 to submit the remaining of their default judgment papers. Plaintiffs have not contacted Mr. Birnbaum or Dabir International, Ltd. concerning this extension as neither defendant is currently represented by counsel.

Respectfully submitted,


John J. Dabney

JJD/RW/jay

cc: David Birnbaum (via U.S. mail)
Dabir International, Ltd. (via U.S. mail)
Catarina Pietra Toumei (via email)
Vladimir Zuravel (via email)
Eli Pichel (via email)

WDC99 2008203+1.067276.0119

U.S. practice conducted through McDermott Will & Emery LLP.

600 Thirteenth Street, N.W. Washington, D.C. 20005-3098 Telephone: +1 202 756 8000 Facsimile: +1 202 756 8087 www.mwe.com